

I wish to make three comments in response to the proposal to record and retain copies of our over-the-air broadcasts.

1) At a time when the FCC is asking for a recommitment to serving the public with our airwaves, this proposal will require us to divert our scarce resources to a recording requirement. At this juncture, I don't know what the costs will be to implement this proposal because I don't even know how to do it. But I am confident that the recording and storage requirements will be a significant cost. This represents resources that normally would go into programming and service to the public.

It also represents an unbelievable waste of resources. I have been a broadcaster for 36 years and an owner for 28 years. Not once in my career have we had a problem in this area, let alone a complaint or a citation. This is regulation remedy at its worst.

2) This proposal is akin to using invasive surgery to remove a boil. I believe there is a problem and the problem needs to be addressed. This proposal blankets the industry when it is clear that the problem is isolated to a few stations and even fewer individuals. I suggest a recording requirement only be initiated when there is a bona fide complaint or a previous violation. Address the problem, not the industry.

I suggest, at a minimum, that all unrated markets be exempt unless cause can be shown for such an onerous requirement.

3) Just like EAS and the public file, this requirement will become an intense enforcement area subjecting everyone to fine and forfeiture. The only person ever to look at our public file was an FCC field inspector, yet this requirement looms over our heads and is subject to extensive regulation. Where is the public served when not one person has ever asked to see it? EAS at the local level is nothing but an ongoing test.....again subject to extreme regulation and open to huge fines. Our public is served by our on-going commitment to warn and inform. This will be just another requirement, expensive to implement, open to excessive fines, and never beneficial to the public we are serving and have served for over a quarter of a century.

Thank you for accepting these comments from a life-long, public-committed, small market broadcaster.

Sincerely,

Alan W. Harris  
President and CEO

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